

**BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 2021-88-E**

IN RE:	)	
Dominion Energy South Carolina,	)	<b>PETITION TO INTERVENE</b>
Incorporated's 2021 Avoided Cost	)	
Proceeding Pursuant to S.C. Code Ann.	)	
Section 58-41-20(A)	)	
	)	

On March 10, 2021, this Commission opened Docket 2021-88-E, relating to Dominion Energy South Carolina (“DESC”) in accordance with the provisions of the South Carolina Energy Freedom Act, S.C. Code Ann. § 58-41-10 *et seq.* (the “Act”). Pursuant to the Act, this Commission, at least once every twenty-four months, must review and approve each electrical utility’s “...standard offer, avoided cost methodologies, form contract power purchase agreements, commitment to sell forms, and any other terms or conditions necessary to implement the terms of [the Act].” S.C. Code Ann. § 58-41-20(A). The Commission’s actions in this proceeding will constitute its latest implementation of the federal Public Utility Regulatory Policies Act of 1978, 16 U.S.C. § 824a-3 (“PURPA”).

Petitioner herein is Pine Gate Renewables, LLC, (“Pine Gate”). This Petition to Intervene is filed pursuant to R. 103-825, of this Commission’s Rules and Regulations and other applicable Rules and Regulations of this Commission, and Petitioner seeks permission to intervene and be made a party of record in the above-referenced Docket, with full rights of participation.

1. Pine Gate is a corporation, incorporated in the State of North Carolina and domesticated to conduct business in the State of South Carolina by the South Carolina Secretary of State’s office.

2. Pine Gate is a fully-integrated utility-scale solar company and a leader in the development, financing, construction and long-term operation and management of renewable energy projects throughout the United States, specifically including DESC service territory. Pine Gate and its affiliates currently have 12 projects totaling 191MWac in operation that sell their output exclusively to DESC pursuant to PURPA and one project totaling 74.98MWac in construction. In addition to helping meet DESC’s need for renewable energy, Pine Gate’s projects in DESC’s service territory will help energy buyers meet their renewable energy goals, create hundreds of good paying jobs, and provide significant new tax revenues for South Carolina local governments.

3. Pine Gate has substantial and specific economic interests in renewable energy in South Carolina and this Commission’s actions thereon.

4. Pine Gate will be directly and substantially affected by the outcome of this proceeding and Pine Gate's business interests will be directly and financially impacted by this Commission's resolution of the subject matter of this Docket.

5. Pine Gate's interests cannot be adequately addressed by any other party. Pine Gate's Intervention will aid this Commission, by assisting in the development of a full and fair record to address the important decision to be made in this Docket.

6. The grounds for this Petition are that this Commission's review and approval of DESC's "...standard offer, avoided cost methodologies, form contract power purchase agreements, commitment to sell forms, and any other terms or conditions...", in DESC's 2021 Avoided Cost Proceeding is important to Pine Gate because of its direct financial impact on Pine Gate.

7. Pine Gate should be allowed to intervene in this Docket, with full rights of cross-examination, discovery, and participation in any Hearing to be scheduled in this Docket.

8. The granting of Pine Gate's Petition to Intervene is (i) in the public interest and (ii) consistent with the policies of this Commission in encouraging maximum public participation in issues before it and intervention should be allowed so that a full and complete record addressing its views and concerns can be developed.

9. This Petition to Intervene is timely filed with this Commission.

10. Pine Gate is represented by counsel in this proceeding:

Richard L. Whitt,  
**WHITT LAW FIRM, LLC**  
401 Western Lane, Suite E  
Irmo, South Carolina 29063  
Telephone: (803) 995-7719  
Richard@RLWhitt.law

J. Blanding Holman IV,  
**PINE GATE RENEWABLES, LLC**  
130 Roberts Street  
Asheville, North Carolina 28801  
Telephone: 919-302-6819  
bholman@pgrenewables.com

**WHEREFORE**, Petitioner prays for the following relief:

- (a) That this Petition to Intervene be accepted and that Petitioner be made a party of record;
- (b) That Petitioner be allowed to participate fully in this proceeding and take such positions as it deems advisable; and
- (c) For such other and further relief as this Commission may deem just and proper.

Respectfully Submitted,

/s/Richard L. Whitt

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Richard L. Whitt,  
**Whitt Law Firm, LLC**  
401 Western Lane, Suite E  
Irmo, South Carolina, 29063  
(803) 995-7719

/s/J. Blanding Holman IV

J. Blanding Holman IV,  
**Pine Gate Renewables, LLC**  
130 Roberts Street  
Asheville, North Carolina 28801  
(919) 302-6819

*Both as Counsel for Petitioner, Pine Gate  
Renewables, LLC.*

May 25, 2021